

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
TIMOTHY KRAFT,

Docket No. 07 CV 2978

Plaintiffs,

-against-

THE CITY OF NEW YORK, P.O. BRETT BARA, P.O. JOSE BUENO, P.O.s JOHN and JANE DOE #1-10, individually and in their official capacities (the names John and Jane Doe being fictitious, as the true names are presently unknown), THE NEW YORK CITY HEALTH AND HOSPITALS CORPORATION, DR. ELI GREENBERG, DR. FADI HADDAD, DR. ALYSON MALLOY, DR. AMY COHEN, and HHC PERSONNEL JOHN and JANE DOE #11-20, E.M.S. SUPERVISOR JOHN DOE #21, COMMON GROUND COMMUNITY H.D.F.C., INC., CENTER FOR URBAN COMMUNITY SERVICES, ROSANNE HAGGERTY, STACY NERI, DAWN BRADFORD, NANCY PORCARO, ORETHA FRANKLIN, and MICHAEL GIORDANO,

**ANSWER TO
CROSS CLAIM**

Defendants.

-----X

Defendants, **CENTER FOR URBAN COMMUNITY SERVICES, INC.**, **STACY NERI and DAWN BRADFORD**, by and through their attorneys, the Law Offices of Patrick J. Maloney, as and for their answer to the cross claims of the defendants, **COMMON GROUND COMMUNITY HDFC, INC.** **ROSANNE HAGGERTY, NANCY PROCARO, ORETHA FRANKLIN AND MICHAEL GIORDANO** allege as follows upon information and belief:

Deny each and every allegation of the cross claims.

Dated: New York, New York
July 6, 2007

Yours, etc.

LAW OFFICES OF PATRICK J. MALONEY

By: _____
Mark A. Solomon (2613)
Attorneys for Defendants
CENTER FOR URBAN COMMUNITY SERVICES,
STACY NERI and DAWN BRADFORD
90 Broad Street – Suite 2202
New York, New York 10004
(646) 428-2650

TO: ROSE M. WEBER, ESQ.
Attorney for Plaintiff
TIMOTHY KRAFT
225 Broadway – Suite 1608
New York, New York 10007
(212) 748-3355

CORPORATION COUNSEL
Attorneys for Defendants
CITY OF NEW YORK, P.O. BRETT BARA,
P.O. JOSE BUENO, THE NEW YORK CITY
HEALTH AND HOSPITALS CORPORATION,
DR. ELI GREENBERG, DR. FADI HADDAD,
DR. ALYSON MALLOY and DR. AMY COHEN
100 Church Street
New York, New York 10007

HOEY KING TOKER & EPSTEIN
Attorneys for Defendants
COMMON GROUND COMMUNITY H.D.F.C., INC.
ROSANNE HAGGERTY, NANCY PORCARO,
ORETHA FRANKLIN AND MICHAEL GIORDANO
55 Water Street – 29TH Floor
New York, New York 10041
(212) 612-4200

CERTIFICATE OF SERVICE

PATRICK J. MALONEY, ESQ. affirms the following under the penalties of perjury under the law of the United States and the State of New York:

I am an attorney at law admitted to practice before the Courts of the State of New York and this Honorable Court.

I am the attorney of record for the defendants, **CENTER FOR URBAN COMMUNITY SERVICES, INC., STACY NERI and DAWN BRADFORD** in this action. I am over the age of eighteen and not a party to the action.

On July 6, 2007, I served the within **ANSWER TO CROSS CLAIM** upon:

ROSE M. WEBER, ESQ.
Attorney for Plaintiff
TIMOTHY KRAFT
225 Broadway – Suite 1608
New York, New York 10007
(212) 748-3355

CORPORATION COUNSEL
Attorneys for Defendants
CITY OF NEW YORK, P.O. BRETT BARA,
P.O. JOSE BUENO, THE NEW YORK CITY
HEALTH AND HOSPITALS CORPORATION,
DR. ELI GREENBERG, DR. FADI HADDAD,
DR. ALYSON MALLOY and DR. AMY COHEN
100 Church Street
New York, New York 10007

HOEY KING TOKER & EPSTEIN
Attorneys for Defendants
COMMON GROUND COMMUNITY H.D.F.C., INC.
ROSANNE HAGGERTY, NANCY PORCARO,
ORETHA FRANKLIN AND MICHAEL GIORDANO
55 Water Street – 29TH Floor
New York, New York 10041
(212) 612-4200

by depositing a true copy thereof enclosed in a properly addressed postpaid envelop in a mail depository under the exclusive control of the United States Postal Service in the State of New York.

Dated: New York, New York
July 6, 2007

Patrick J. Maloney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
TIMOTHY KRAFT,

Docket No. 07 CV 2978

Plaintiffs,

-against-

THE CITY OF NEW YORK, P.O. BRETT BARA, P.O. JOSE BUENO, P.O.s JOHN and JANE DOE #1-10, individually and in their official capacities (the names John and Jane Doe being fictitious, as the true names are presently unknown), THE NEW YORK CITY HEALTH AND HOSPITALS CORPORATION, DR. ELI GREENBERG, DR. FADI HADDAD, DR. ALYSON MALLOY, DR. AMY COHEN, and HHC PERSONNEL JOHN and JANE DOE #11-20, E.M.S. SUPERVISOR JOHN DOE #21, COMMON GROUND COMMUNITY H.D.F.C., INC., CENTER FOR URBAN COMMUNITY SERVICES, ROSANNE HAGGERTY, STACY NERI, DAWN BRADFORD, NANCY PORCARO, ORETHA FRANKLIN, and MICHAEL GIORDANO,

Defendants.

-----X

ANSWER TO CROSS CLAIM

LAW OFFICES OF PATRICK J. MALONEY

Attorneys for Defendants

CENTER FOR URBAN COMMUNITY SERVICES, CENTER FOR URBAN COMMUNITY SERVICES, INC., STACI NERI and DAWN BRADFORD

90 Broad Street – Suite 2202
New York, New York 10004
(646) 428-2650